HERITAGE-WTI, Inc.

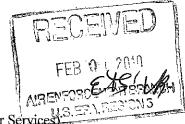
1250 St. George Street East Liverpool, Ohio 43920-3400

Phone: 330-385-7337 Fax: 330-385-7813

Web Site: www.heritage-wti.com

January 31, 2010 VIA UPS and OEPA Air Services

Mr. George Czerniak, Chief (UPS) U.S. EPA Region V Air Enforcement and Compliance Assurance Branch Mail Code AE-17J 77 West Jackson Chicago, IL 60604 HERITAGE-WTI ISO 14001



Ms. Pamela Korenewych (Air Seg OEPA-DAPC-NEDO

2110 E. Aurora Road Twinsburg, OH 44087

RE:

HERITAGE-WTI, INC.

SEMI-ANNUAL STARTUP, SHUTDOWN, AND MALFUNCTION REPORT &

SEMI-ANNUAL EXCESS EMISSIONS AND CMS REPORT

Greetings:

Please find enclosed a written report entitled *Semi-Annual Startup*, *Shutdown*, *and Malfunction Report* and *Semi-Annual Excess Emission and CMS Report* for Heritage-WTI, Inc. These reports are required by 40 CFR 63.10 and cover the time period of July 1, 2009 through December 31, 2009.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are certain penalties for submitting false information including the possibility of fine and imprisonment for knowing violations.

Thank you and if you have any questions or comments, please call me at the above number.

Sincerely,

Frank Murray General Manager

Heritage-WTI, Inc.

Draw Mlarry

SEMI-ANNUAL STARTUP, SHUTDOWN, AND MALFUNCTION REPORT & SEMI-ANNUAL EXCESS EMISSION AND CMS REPORT

for

Heritage-WTI, Inc.

January 31, 2010

Section I - General Information

A. Facility Information

Facility ID:	02-15-02-0233
Responsible Official's	Frank Murray
Name / Title:	General Manager
Street Address:	1250 Saint George Street
City:	East Liverpool
State:	Ohio
Zip Code:	43920
Facility Name:	Heritage-WTI, Inc.
Facility Local Contact	Vincent Waggle
Name:	Environmental Engineer

- B. Relevant standard(s) or other requirement(s) that is/are the basis for this report:
- 63.10(d)(5)(i) Periodic Startup, Shutdown, and Malfunction Reports
- C. Are you requesting a waiver of recordkeeping and/or reporting requirements under the applicable relevant standard(s) in conjunction with this report?

Yes	×N	C

If you answered yes, you must submit the application for a waiver of recordkeeping and/or reporting requirements together with this report. The application for waiver should include whatever information you consider useful to convince the Administrator that a waiver of recordkeeping or recording is warranted. (63.10(f)(3)

Section II - Certification

Based upon information and belief formed after a reasonable inquiry, I as a responsible official of the above-mentioned facility, certify the information contained in this report is accurate and true to the best of my knowledge.

Frank Murray, General Manager	A	Date: 1/25/10
Signature:	Vime	

Section III - Startup, Shutdown, and Malfunction Reports

A. Startup, Shutdown, or Malfunction Actions

All actions taken by Heritage-WTI, Inc. during startup, shutdown, or malfunction events during the reporting period of July 1, 2009 through December 31, 2009 were consistent with the procedures specified in the facility's Startup, Shutdown, and Malfunction Plan.

B. Malfunctions

Please find in the table below a list of each malfunction, the durations, and a brief description of the type of malfunction that occurred during the reporting period of July 1, 2009 through December 31, 2009.

See next page for completed table

Name	Start Time	End Time	Cause (report)	Cause Description	(hr)	(min)	(sec)	Excess Emission	Parameter Monitor Exceedance	During Startup	During Shutdown	During Malfunction
THC	7/3/2009 10:33:23 AM		Malfunction - Lance Plugging	Solid material in tank waste causing lance plugging resulting in THC.	0	29	58	Yes	No	No	No	Yes
THC	7/4/2009 1:03:27 AM		Malfunction - Lance Plugging	Solid material in tank waste causing lance plugging resulting in THC.	0	24	1	Yes	No	No	No	Yes
THC	7/9/2009 7:18:28 PM	8:17:28 PM	Malfunction - Waste Feed Anomaly	Normal waste feed caused unexpected and unpreventable THC event.	0	59	0	Yes	No	No	No	Yes
Scrubber ECIS Pressure		12:59:37 PM	Shutdown - ECIS Maintenance	Unit shutdown to repair ECIS blower motor.	1	22	6	No	Yes	No	Yes	No
ESP Field #1 Current	7/19/2009 10:55:24 AM	7/19/2009 11:38:25 AM	Shutdown - ESP Maintenance	Unit shutdown to clean ESP field #1	0	43	1	No	Yes	No	Yes	No
SCC Pressure Using Seals	7/20/2009 8:19:18 PM	8:19:33 PM	Malfunction - Waste Feed Anomaly	Normal waste feed caused unexpected and unpreventable pressure event.	0	0	15	No	No	No	No	No
THC	7/20/2009 8:25:22 PM		Malfunction - Prior AWFCO	Prior AWFCO caused inability to control THC.	1	0	0	Yes	No	No	No	Yes
ESP Not Ready	7/21/2009 3:07:45 PM	3:10:07 PM	Malfunction - Instrument Malfunction	Controller on field three tripped off.	0	2	22	No	Yes	No	No	Yes
ESP Not Ready	7/21/2009 3:16:56 PM	3:20:06 PM	Malfunction - Instrument Malfunction	Controller on field three tripped off.	0	3	10	No	Yes	No	No	Yes
Scrubber ECIS Flow	7/21/2009 4:07:23 PM	- 1		Carbon bridge in feed hopper caused flow loss.	0	5	0	No	Yes	No	No	Yes

Name	Start Time	End Time	Cause (report)	Cause Description	(hr)	(min)	(sec)	Excess Emission	Parameter Monitor Exceedance	During Startup	During Shutdown	During Malfunction
ESP Not Ready	7/21/2009 5:45:21 PM	5:47:09 PM	Malfunction - Instrument Malfunction	Controller on field three tripped off.	0	1	48	No	Yes	No	No	Yes
SCC Pressure Using Seals	7/24/2009 7:52:02 AM	7:52:16 AM	Malfunction - Instrument Malfunction	Bad quench thermocouple cause ID Fan shutdown.	0	0	14	No	Yes	No	No	Yes
SCC Temperature	7/24/2009 8:04:28 AM		Malfunction - Prior AWFCO	Lost temp during prior AWFCO event.	0	12	4	No	Yes	No	No	Yes
THC	7/31/2009 3:39:22 PM	4:16:21 PM	Malfunction - Waste Feed Anomaly	Normal waste feed caused unexpected and unpreventable THC event.	0	36	59	Yes	No	No	No	Yes
THC	8/11/2009 6:54:27 AM		Malfunction - Lance Plugging	Plugging in the sludge lance caused THC spike.	1	0	1	Yes	No	No	No	Yes
SCC Pressure Using Seals	8/12/2009 1:12:18 AM	8/12/2009 1:12:31 AM	Malfunction -	Normal waste feed caused unexpected and unpreventable pressure event.	0	0	13	No	Yes	No	No	Yes
THC	8/12/2009 8:20:30 PM		Malfunction - Lance Slagging	Slag build-up on the hi- BTU lance caused poor combustion	0	0	59	Yes	No	No	No	Yes
SCC Pressure Using Seals	8/13/2009 10:38:29 AM		Malfunction - Kiln Fan/Burner	Gas burner blower malfunction caused MACT events.	0	0	3	No	Yes	No	No	Yes
SCC Pressure Using Seals	8/13/2009 10:38:36 AM		1	Gas burner blower malfunction caused MACT events.	0	0	11	No	Yes	No	No	Yes
SCC Pressure Using Seals	8/13/2009 10:39:34 AM		1	Gas burner blower malfunction caused	0	0	3	No	Yes	No	Yes	No

Name	Start Time	. End Time	Cause (report)	Cause Description	(hr)	(min)	(sec)	Excess Emission	Parameter Monitor Exceedance	During Startup	During Shutdown	During Malfunction
			Malfunction	MACT events.								
Kiln Temperature	8/13/2009 10:43:30 AM	11:43:30 AM	Shutdown - Burner Malfunction	Gas burner blower malfunction caused MACT events.	1	0	0	No	Yes	No	Yes	No
ESP Not Ready	8/14/2009 4:15:44 AM	4:17:41 AM	Malfunction - ESP Malfunction	Electrical breaker on ESP field three caused field shutdown.	0	1	57	No	Yes	No	No	Yes
SCC Temperature	8/21/2009 1:32:25 PM	2:14:33 PM	Malfunction - Instrument Malfunction	DCS card failure caused unit shutdown.	0	42	8	No	Yes	No	Yes	No
Kiln Temperature	8/21/2009 1:39:25 PM	2:14:33 PM		DCS card failure caused unit shutdown.	0	35	8	No	Yes	No	Yes	No
THC	8/22/2009 3:54:24 AM	4:55:23 AM		Normal waste feed caused unexpected and unpreventable THC event.	1	0	59	Yes	No	No	No	Yes
SCC Pressure Using Seals	8/23/2009 5:55:41 PM		Fan Shutdown	ID Fan main bus breaker tripped causing shutdown.	0	1	48	No	Yes	No	No	Yes
SCC Pressure Using Seals	8/29/2009 7:45:17 AM	8/29/2009 7:45:23 AM	Clinker	Ash fall from SCC to quench caused extreme system pressure.	0	0	6	No	Yes	No	No	Yes
THC	8/29/2009 7:49:22 AM	8/29/2009 8:34:22 AM	Clinker	Ash fall from SCC to quench caused THC event.	0	45	0	Yes	No	No	No	Yes
SCC Pressure Using Seals	9/2/2009 3:12:36 AM	9/2/2009 3:12:40 AM	Clinker	Ash fall from SCC to quench caused extreme system pressure.	0	0	4	No	Yes	No	No	Yes
SCC Pressure Using Seals	9/2/2009 3:12:43 AM	9/2/2009 I 3:13:00 AM	1	Ash fall from SCC to quench caused extreme	0	0	17	No	Yes	No	No	Yes

Name	Start Time	End Time	Cause (report)	Cause Description	(hr)	(min)	(sec)	Excess Emission	Parameter Monitor Exceedance	During Startup	During Shutdown	During Malfunction
				system pressure.								
SCC Pressure Using Seals	9/4/2009 7:51:38 PM		Malfunction - Clinker	Ash fall from SCC to quench caused extreme system pressure.	0	0	7	No	Yes	No	No	Yes
THC	9/4/2009 7:55:24 PM		Malfunction - Prior AWFCO	Prior AWFCO caused THC spike and exceedance.	1	0	57	Yes	No	No	No	Yes
THC	9/8/2009 3:42:20 PM	4:44:21 PM	Malfunction - Waste Feed Anomaly	Normal waste feed caused unexpected and unpreventable THC event.	1	2	1	Yes	No	No	No	Yes
SCC Pressure Using Seals	9/9/2009 10:53:26 AM	9/9/2009 10:55:49 AM	Malfunction - Instrument	Maintenance on pressure transmitters caused false pressure reading.	0	2	23	No	Yes	No	No	Yes
THC	9/11/2009 2:21:21 PM	3:11:21 PM	Malfunction - Waste Feed Anomaly	Normal waste feed caused unexpected and unpreventable THC event.	0	50	0	Yes	No	No	No	Yes
Kiln Temperature	9/15/2009 4:56:27 AM		Malfunction - Lance Plugging	Plugging of the organic piping and lance inhibited flow and caused temp loss.	0	16	57	No	Yes	No	No	Yes
THC	9/17/2009 12:06:22 AM		Lance Slagging	Slag build-up on the hi- BTU and Organic lances caused poor combustion	0	32	0	Yes	No	No	No	Yes
THC	9/21/2009 9:46:21 PM		Malfunction - Lance Plugging	Plugging and purging of the sludge lance caused THC spike.	0	18	1	Yes	No	No	No	Yes
SCC Pressure Using Seals	9/21/2009 10:00:58 PM	9/21/2009 10:01:01 PM		Ash fall from SCC to quench caused system over-pressure.	0	0	3	No	Yes	No	No	Yes

Name	Start Time	End Time	Cause (report)	Cause Description	(hr)	(min)	(sec)	Excess Emission	Parameter Monitor Exceedance	During Startup	During Shutdown	During Malfunction
ТНС	9/24/2009 3:30:20 PM	4:29:21 PM	Malfunction - Waste Feed Anomaly	Normal waste feed caused unexpected and unpreventable THC event.	0	59	1	Yes	No	No	No	Yes
SCC Pressure Using Seals	10/8/2009 9:15:29 PM	10/8/2009] 9:15:32 PM	Malfunction - Clinker	Ash fall from SCC to quench caused system over-pressure.	0	0	3	No	Yes	No	No	Yes
SCC Pressure Using Seals	10/8/2009 9:15:36 PM	10/8/2009 I 9:15:43 PM	1	Ash fall from SCC to quench caused system over-pressure.	0	0	7	No	Yes	No	No	Yes
SDA ECIS Flow	10/9/2009 4:56:21 AM	10/9/2009 S 6:58:26 AM I	ECIS	Unit shutdown to repair ECIS carbon feed system.	2	2	5	No	Yes	No	Yes	No
SDA ECIS Pressure	10/9/2009 5:21:24 AM	10/9/2009 6:58:31 AM I	ECIS	Unit shutdown to repair ECIS carbon feed system.	1	37	7	No	Yes	No	Yes	No
SDA ECIS Flow	10/9/2009 7:02:21 AM	10/9/2009 S 7:27:25 AM I	ECIS	Unit shutdown to repair ECIS carbon feed system.	0	25	4	No	Yes	Ν̈́ο	Yes	No
SDA ECIS Pressure	10/9/2009 7:02:26 AM	10/9/2009 S 7:20:23 AM I	ECIS	Unit shutdown to repair ECIS carbon feed system.	0	17	57	No	Yes	No	Yes	No
SCC Pressure Using Seals	10/14/2009 7:27:01 PM	10/14/2009 N 7:27:03 PM C	linker	Ash fall from SCC to quench caused system over-pressure.	0	0	2	No	Yes	No	No	Yes
SDA ECIS Flow	10/17/2009 6:11:20 AM	10/17/2009 N 6:18:22 AM F	Topper Plugging	Wet carbon plugging SD ECIS hopper and screw causing low flow.	0	7	2	No	Yes	No	No	Yes
SDA ECIS Flow	10/17/2009 6:55:23 AM	10/17/2009 N 7:09:20 AM F	Iopper Plugging	Wet carbon plugging SD ECIS hopper and screw causing low flow.	0	13	57	No	Yes	No	No	Yes

Name	Start Time	End Time	Cause (report)	Cause Description	(hr)	(min)	(sec)	Excess Emission	Parameter Monitor Exceedance	During Startup	During Shutdown	During Malfunction
SCC Pressure Using Seals	10/19/2009 12:13:02 AM	12:13:04 AM	Malfunction - System In- leakage	System In-leakage prevented operator from being able to control pressure swings.	0	0	2	No	Yes	No	No	Yes
SCC Pressure Using Seals	10/19/2009 2:49:20 PM	2:49:26 PM	Malfunction - System In- eakage	System In-leakage prevented operator from being able to control pressure swings.	0	0	6	No	Yes	No	No	Yes
SCC Pressure Using Seals	10/20/2009 7:42:06 PM	7:42:11 PM	Malfunction - System In- eakage	System In-leakage prevented operator from being able to control pressure swings.	0	0	5	No	Yes	No	No	Yes
THC	10/21/2009 2:01:20 PM		Malfunction - ance Slagging	Lance slagging caused poor atomization and THC event.	1	0	0	Yes	No	No	No	Yes
SCC Pressure Using Seals	10/23/2009 10:49:31 AM		Malfunction - Boiler Plugging	Slag build-up in boiler reduced the ability to control pressure	0	0	3	No	Yes	No	No	Yes
SCC Pressure Using Seals	10/24/2009 9:04:31 PM		Malfunction - Boiler Plugging	Slag build-up in boiler reduced the ability to control pressure	0	0	3	No	Yes	No	No	Yes
SCC Pressure Using Seals	10/24/2009 9:04:39 PM		Malfunction - Boiler Plugging	Slag build-up in boiler reduced the ability to control pressure	0	0	3	No	Yes	No	No	Yes
SCC Pressure Using Seals	10/24/2009 11:28:49 PM	10/24/2009 N 11:28:54 PM E	Aalfunction - Boiler Plugging	Slag build-up in boiler reduced the ability to control pressure	0	0	5	No	Yes	No	No	Yes
SCC Pressure Using Seals	10/25/2009 1:13:43 AM	10/25/2009 N 1:13:49 AM E	Talfunction - Boiler Plugging	Slag build-up in boiler reduced the ability to control pressure	0	0	6	No	Yes	No	No	Yes
SCC Pressure	10/25/2009	10/25/2009 N	Ialfunction -	Slag build-up in boiler	0	0	5	No	Yes	No	No	Yes

Name	Start Time	End Time	Cause (report)	Cause Description	(hr)	(min)	(sec)	Excess Emission	Parameter Monitor Exceedance	During Startup	During Shutdown	During Malfunction
Using Seals	2:11:39 AM	2:11:44 AM	Boiler Plugging	reduced the ability to control pressure								
SCC Pressure Using Seals	10/25/2009 4:14:40 AM		Malfunction - Boiler Plugging	Slag build-up in boiler reduced the ability to control pressure	0	0	8	No	Yes	No	No	Yes
SCC Pressure Using Seals	10/25/2009 4:27:22 AM	,	Malfunction - Boiler Plugging	Slag build-up in boiler reduced the ability to control pressure	0	0	4	No	Yes	No	No	Yes
SCC Pressure Using Seals	10/25/2009 6:50:42 AM		Malfunction - Boiler Plugging	Slag build-up in boiler reduced the ability to control pressure	0	0	2	No	Yes	No	No	Yes
THC	10/25/2009 10:25:22 AM		Malfunction - Lance Purging	Nitrogen purge on the sludge pump caused THC spike.	0	56	1	Yes	No	No	No	Yes
ESP Not Ready	10/25/2009 5:29:49 PM		Shutdown - Kiln Outage	Unit shutdown for Kiln Shell replacement	0	3	37	No	No	No	Yes	No
ESP Field #1 Current	10/25/2009 5:54:22 PM	10/25/2009 8:08:05 PM	1	Unit shutdown for Kiln Shell replacement	2	13	43	No	Yes	No	Yes	No
ESP Inlet Temperature	11/20/2009 9:24:01 AM	9:24:01 AM	Malfunction - Kiln Drive Failure	Unit shutdown due to Kiln Drive failure	0	0	0	No	Yes	No	No	Yes
SCC Temperature	11/20/2009 10:28:00 AM	12:04:00 PM	1	Unit shutdown due to Kiln Drive failure	1	36	0	No	Yes	No	No	Yes
Kiln Temperature	11/20/2009 10:46:00 AM	11:51:00 AM	Malfunction - Kiln Drive Failure	Unit shutdown due to Kiln Drive failure	1	5	0	No	Yes	No	No	Yes
THC	11/20/2009 2:36:00 PM	3:32:00 PM	Waste Feed Anomaly	Normal waste feed caused unexpected and unpreventable THC event.	0	56	0	Yes	No	No	No	Yes

Name	Start Time	End Time	Cause (report)	Cause Description	(hr)	(min)	(sec)	Excess Emission	Parameter Monitor Exceedance	During Startup	During Shutdown	During Malfunction
SCC	11/20/2009			Lost OPL on ID Fan	0	28	0	No	Yes	No	No	Yes
Temperature RJ Blowdown	8:15:00 PM 11/20/2009		Fan Shutdown	shutdown Lost OPL on ID Fan	0	0.5	0	- NT-		- T-	> T-	
Flow	8:18:00 PM		Mairunction - 112 Fan Shutdown	shutdown	0	25	U	No	Yes	No	No	Yes
Kiln Temperature	11/20/2009 8:23:00 PM		Malfunction - ID Fan Shutdown	Lost OPL on ID Fan shutdown	0	20	0	No	Yes	No	No	Yes
THC	11/20/2009 10:25:00 PM	11:23:00 PM	Malfunction - Waste Feed Anomaly	Normal waste feed caused unexpected and unpreventable THC event.	0	58	0	Yes	No	No	No	Yes
ТНС	11/22/2009 4:36:00 AM	5:11:00 AM	Anomaly	Normal waste feed caused unexpected and unpreventable THC event.	0	35	0	Yes	No	No	No	Yes
THC	11/24/2009 4:22:27 PM	4:30:28 PM	Waste Feed Anomaly	Normal waste feed caused unexpected and unpreventable THC event.	0	8	1	Yes	No	No	No	Yes
SCC Pressure Using Seals	11/28/2009 4:49:23 AM	11/28/2009 4:49:27 AM	1	Ash fall from SCC to quench caused system over-pressure.	0	0	4	No	Yes	No	No	Yes
SCC Pressure Using Seals	11/28/2009 4:49:30 AM	11/28/2009 I 4:49:36 AM		Ash fall from SCC to quench caused system over-pressure.	0	0	6	No	Yes	No	No	Yes
Total PB Flow	12/1/2009 1:25:29 PM	5:06:36 PM	crubber	Unit shutdown to perform necessary scrubber maintenance	3	41	7	No	Yes	No	No	Yes
RJ Blowdown Flow	12/1/2009 3:29:28 PM	3:34:28 PM S	Scrubber Vaintenance	Unit shutdown to perform necessary scrubber maintenance	0	5	0	No	Yes	No	No	Yes
THC	12/3/2009	12/3/2009 N	Malfunction -	Bulk feed blew up in	0	32	1	Yes	No	No	No	Yes

Name	Start Time	End Time	Cause (report)	Cause Description	(hr)	(min)	(sec)	Excess Emission	Parameter Monitor Exceedance	During Startup	During Shutdown	During Malfunction
	4:12:22 PM	4:44:23 PM	Waste Anomaly	feed chute causing THC spike.								
SDA ECIS Pressure	12/4/2009 4:55:26 PM	ſ	Malfunction - ECIS Repairs	Unit shutdown to perform ECIS screw repair	1	1	5	No	Yes	No	No	Yes
SCC Pressure Using Seals	12/8/2009 6:59:53 AM	12/8/2009 6:59:55 AM	Malfunction - Clinker Fell	Ash fall from SCC to quench caused system over-pressure.	0	0	2	No	Yes	No	No	Yes
THC	12/10/2009 3:36:21 AM	1	Malfunction - Waste Anomaly	Normal waste feed caused unexpected and unpreventable THC event.	0	35	1	Yes	No	No	No	Yes
SCC Pressure Using Seals	12/1 <mark>4/2009</mark> 9:37:42 PM	12/14/2009 9:37:45 PM	Malfunction - Clinker Fell	Ash fall from SCC to quench caused system over-pressure.	0	0	3	No	Yes	No	No	Yes
SCC Pressure Using Seals	12/14/2009 10:12:17 PM		1	Ash fall from SCC to quench caused system over-pressure.	0	0	8	No	Yes	No	No	Yes
SCC Pressure Using Seals	12/14/2009 10:12:27 PM	12/14/2009 10:12:33 PM		Ash fall from SCC to quench caused system over-pressure.	0	0	6	No	Yes	No	No	Yes
SCC Pressure Using Seals	12/15/2009 1:25:07 AM	12/15/2009 1:25:09 AM	1	Ash fall from SCC to quench caused system over-pressure.	0	0	2	No	Yes	No	No	Yes
SCC Pressure Using Seals	12/15/2009 1:25:12 AM	12/15/2009 1:25:15 AM	1	Ash fall from SCC to quench caused system over-pressure.	0	0	3	No	Yes	No	No	Yes
SCC Pressure Using Seals	12/19/2009 3:13:16 PM	12/19/2009 I 3:13:25 PM I	3quipment	Slag Quench drain Valve stuck open causing seal loss.	0	0	9	No	Yes	No	· No	Yes
SCC Pressure	12/19/2009	12/19/2009 1	Malfunction -	Slag Quench drain Valve	0	7	17	No	Yes	No	No	Yes

Name	Start Time	End Time	Cause (report)	Cause Description	(hr)	(min)	(sec)	Excess Emission	Parameter Monitor Exceedance	During Startup	During Shutdown	During Malfunction
Using Seals	3:13:36 PM	3:20:53 PM	Equipment	stuck open causing seal loss.								
SCC Pressure Using Seals	12/19/2009 3:21:04 PM		Malfunction - Equipment	Slag Quench drain Valve stuck open causing seal loss.	0	0	4	No	Yes	No	No	Yes
SCC Pressure Using Seals	12/19/2009 3:21:21 PM	12/19/2009 3:21:23 PM	Malfunction - Equipment	Slag Quench drain Valve stuck open causing seal loss.	0	0	2	No	Yes	No	No	Yes
SCC Pressure Using Seals	12/19/2009 3:21:36 PM	12/19/2009 3:21:51 PM	Malfunction - Equipment	Slag Quench drain Valve stuck open causing seal loss.	0	0	15	No	Yes	No	No	Yes
SCC Pressure Using Seals	12/19/2009 3:22:03 PM	12/19/2009 3:22:08 PM	Malfunction - Equipment	Slag Quench drain Valve stuck open causing seal loss.	0	0	5	No	Yes	No	No	Yes
SCC Temperature	12/19/2009 3:30:25 PM	12/19/2009 4:52:27 PM	Malfunction - Equipment	Slag Quench drain Valve stuck open causing seal loss.	1	22	2	No	Yes	No	No	Yes
SCC Pressure Using Seals	12/19/2009 3:34:14 PM	12/19/2009 3:34:25 PM	Malfunction - Equipment	Slag Quench drain Valve stuck open causing seal loss.	0	0	11	No	Yes	No	No	Yes
Kiln Temperature	12/19/2009 3:43:26 PM	12/19/2009 4:45:23 PM	Malfunction - Equipment	Slag Quench drain Valve stuck open causing seal loss.	1	1	57	No	Yes	No	No	Yes
Process Gas Flow	12/19/2009 3:49:26 PM	12/19/2009 4:37:25 PM	Malfunction - Equipment	Slag Quench drain Valve stuck open causing seal loss.	0	47	59	No	Yes	No	No	Yes
THC	12/20/2009 4:16:23 PM		Malfunction - Lance Plugging	Plugging in the sludge lance caused purge resulting in THC.	0	59	59	Yes	No	No	No	Yes
THC	12/22/2009	12/22/2009	Malfunction -	Normal waste feed	0	59	2	Yes	No	No	No	Yes

Name	Start Time	End Time	Cause (report)	Cause Description	(hr)	(min	(sec)	Excess Emission	Parameter Monitor Exceedance	During Startup	During Shutdown	During Malfunction
	6:29:22 PM	7:28:24 PM	Waste Anomaly	caused unexpected and unpreventable THC event.								
SCC Pressure Using Seals	12/24/2009 9:57:42 AM	10:04:24 AM	Equipment Problem	Air line to emergency water valve failed causing ID Fan Shutdown	0	ϵ	42	No	Yes	No	No	Yes
SCC Pressure Using Seals	12/27/2009 8:55:09 AM			Ash fall from SCC to quench caused system over-pressure.	0	C	6	No	Yes	No	No	Yes
SCC Pressure Using Seals	12/27/2009 8:55:18 AM	12/27/2009 8:55:24 AM	Clinker Fell	Ash fall from SCC to quench caused system over-pressure.	0	0	6	No	Yes	No	No	Yes

C. Startup, Shutdown, or Malfunction Plan Revision History

DATE	Revision Number	Comment
9/30/2003	0	Initial Plan
2/27/2004	1	ESP OPLs added. Malfunction list updated.
6/23/2005	2	Revised section on operating modes.
0/23/2003		Revised section on operating modes.
	_	
10/27/2006	3	RCRA Permit modifications. Malfunction list updated.
2/15/2007	1	Malfunction list updated and comments added addressing instances
3/15/2007	4	beyond the operator's control.
		· ·
		Malfunction list updated and further comments added addressing
6/6/2007	5	instances beyond the operator's control.
10/16/2007	6	Corrected minor deficiencies noted by OEPA.
9/1/2008	7	Designed to medicat facility manner share as
9/1/2008		Revised to reflect facility name change
1		This revision included, in Section 1.6.3.1, more detailed descriptions of
		the most common malfunction events that occur at the facility. It also
		included a description of data collection procedures during times when residence time expires while an exceedance event is taking place in
		Section 1.6.3.
6/12/2009	88	

SEMI-ANNUAL EXCESS EMISSION AND CMS REPORT

Section I - General Information

A. Facility Information

Facility ID:	02-15-0233					
Responsible Official's Name / Title:	Frank Murray / Vice President & General Manager					
Street Address:	1250 Saint George Street					
City:	East Liverpool					
State:	Ohio					
Zip Code:	43920					
Facility Name:	Heritage-WTI, Inc.					
Facility Local Contact Name:	Local contact is the same information as given above.					
B. Relevant standard(s) or oth	er requirement(s) that is/are the basis for this report:					
63.10(e)(3) – Excess Emission	ns and Continuous Monitoring System Performance Report					
C. Are you requesting a waive relevant standard(s) in conjun	er of recordkeeping and/or reporting requirements under the applicable ction with this report?					
□ Yes 🗵	No					
If you answered yes, you must submit the application for a waiver of recordkeeping and/or reporting requirements together with this report. The application for waiver should include whatever information you consider useful to convince the Administrator that a waiver of recordkeeping or recording is warranted. (63.10(f)(3))						
D. Check the box that corresp	onds to the reports you are submitting:					
☐ Summary Report	Only (Complete Sections II and IV)					
	n and CMS Performance Report and Summary Report (Complete Sections II,					
III, and IV).						
Section II - Cartific	ation					

<u>Section II – Certification</u>

Based upon information and belief formed after a reasonable inquiry, I as a responsible official of the above-mentioned facility, certify the information contained in this report is accurate and true to the best of my knowledge.

, ,	1 1
Frank Murray, General Manager	Date: 1[26]10
Signature: OW/ MM	,

Section III - Excess Emissions and CMS Performance Report

A. Excess Emissions
 Have any excess emissions or exceedances of a parameter occurred during this reporting period Yes □ No
2. If you answered yes, complete the following table for each period of excess emissions and/or parameter monitoring exceedances, as defined in the relevant standard(s), that occurred during startups, shutdowns, and/or malfunctions of your affected source, or during periods other than startups, shutdowns, and/or malfunctions of your affected source. (63.10(c)(7)-(11))

See next page for completed table.

Name	Start Time	End Time	Cause	Cause	Corrective Actions	(hr)	(min)	(sec)
THC	7/2/2009	7/2/2000	(report) Operator	Description Too hoovy of a				
THE	9:49:24 PM			Too heavy of a waste feed	Reduced charge sizes. Restart unit.	0	29	59
	7.47.241 1		Feed Size	caused THC	Sizes. Restart unit.	l		
	}		1 COU DIEC	exceedance.			ļ	
THC	7/3/2009	7/3/2009	Operator	Too heavy of a	Reduced charge	0	 58	59
	i	2:28:21 AM		waste feed	sizes. Restart unit.		اەر	29
			Feed Size	caused THC	James, respirate title.	' j		
				exceedance.		1		
THC	7/15/2009		Operator	Improper drum	Restarted unit.	0	56	0
	1:26:23 PM	2:22:23 PM	Error- Feed	feed caused THC	Reduced charge	-		
			Error	exceedance.	size.	ĺ		
SCC	7/17/2009		Operator	Operator did not	Regained	0	49	59
Temperature	11:12:26	l		properly maintain	temperature.	ļ		
	AM	PM	Poor	temperature.	Restarted unit.		Į	
			Operation					
SCC	8/6/2009		Operator	Operator failed to		0	14	3
Temperature	8:35:23 PM	8:49:26 PM	` ·	maintain SCC	temperature.		{	
			Poor	temperature	Restart unit	.		
	0/5/0000		Operation					
SCC	9/5/2009		Operator		Regain temperature	0	11	2
Temperature	11:11:25 PM	l		adjust to falling	and restarted unit.)		
	FIVE	PIVI	Poor	SCC temperature.				
SCC Pressure	10/10/2000	10/10/2009	Operation	 	15:4:10			
Using Seals	1	6:56:26 AM		Improperly prepared waste	Maintain draft.	0	0	6
Came Deals	0.30,20 AW	0.50,20 AM	Prep	feed caused SCC	Improve communication.			
	l ·		ТТОР	Pressure	Communication.	.]	-	
				exceedance.		l		
THC	10/10/2009	10/10/2009	Operator	Improperly	Restart unit.	0	7	3
		7:07:24 AM	-	prepared waste	Improve		- 1	
	·		Prep		communication.			
				exceedance.	}	- 1	-	
THC	10/20/2009		Operator	Improperly	Reduce charge size.	1	0	59
	10:32:21			prepared waste	Restart unit.			-
	PM	PM	Prep	feed caused THC	[ĺ	ĺ	
222	4.0.40.5			exceedance.		<u>-</u>		
SCC Pressure	l .				Maintained draft	0	0	7
Using Seals	6:37:46 AM	6:37:53 AM		prepared waste	using ID fan			
			Prep		damper.	J		
:				Pressure			İ	
				exceedance.				
					,	ł	ļ	
THC	12/3/2009	12/3/2009	Operator	Operator fed	Restarted unit.	0	12	1
•	10:13:21	l		waste at an	Reviewed operating	Y	12	1
	AM		Poor	inappropriate	guidance with		İ	
			Operation	time.	operators.			
	ſ							
THC	12/3/2009	12/3/2009		Operator fed	Restarted unit.	0	12	59

Name	Start Time	End Time	Cause (report)	Cause Description	Corrective Actions	(hr)	(min)	(sec)
	AM			** 1	guidance with operators.	!		
THC	12/7/2009 2:48:22 PM	12/7/2009 2:55:23 PM	Error -		Remove slide gates on remaining containers.	0	7	1
SCC Pressure Using Seals		12/7/2009 6:25:43 PM	Error -	caused THC	Drop ring on remaining containers.	0	0	6
SCC Pressure Using Seals		12/7/2009 6:25:51 PM	Error -		Drop ring on remaining containers.	0	0	5
SCC Pressure Using Seals		12/8/2009 2:42:27 AM	Error -	Improper charge size caused THC event.	Reduce charge size.	0	0	2
SCC Pressure Using Seals		12/21/2009 9:04:25 AM		Improperly prepared container feed caused THC spike.	Revised feed prep and restarted unit.	0	0	3
SCC Pressure Using Seals		12/21/2009 9:04:33 AM		Improperly prepared container feed caused THC spike.	Revised feed prep and restarted unit.	0	0	3

B. CMS Performance

- 1. Has a CMS been inoperative (except for zero/low-level and high-level checks), out of control (as defined in 63.8(c)(7)(i)), repaired, or adjusted during this reporting period? ☑ Yes ☐ No
- 2. If you answered yes, complete the following table for each period a CMS was out of control, repaired, or adjusted: (63.10(c)(5)-(6), (10)-(12); 63.8(c)(8).

CMS Type	Mfg	Process ID	Start Date	Completion Date	Nature & Cause of Malfunction (if any)	Corrective Actions Taken or Preventative Measures Adopted	Nature of Repairs or Adjustments Made to Inoperable or OOC CMS
ТНС	CAI	Stack monitor #1	10/15/2009	10/15/2009	Instrument Drift	Manual Calibration	Manual Calibration
THC	CAI	Stack monitor #1	12/6/2009	12/6/2009	Instrument Drift	Manual Calibration	Manual Calibration
ТНС	CAI	Stack monitor #1	12/9/2009	12/9/2009	Instrument Drift	Manual Calibration	Manual Calibration
THC	CAI	Stack monitor #1	12/26/2009	12/26/2009	Instrument Drift	Manual Calibration	Manual Calibration
THC	CAI	Stack monitor #2	10/4/2009	10/4/2009	Instrument Drift	Manual Calibration	Manual Calibration
THC	CAI	Stack monitor #2	10/11/2009	10/11/2009	Instrument Drift	Manual Calibration	Manual Calibration
THC	CAI	Stack monitor #2	12/12/2009	12/12/2009	Instrument Drift	Manual Calibration	Manual Calibration

3. Indicate the total process operating time during the reporting period. (63.10(c)(13))

Total process operating time (days):

Days in reporting period:

184

Facility total process operating time (days):

158.75

Total days on waste:

156.41

Total days on fuels:

2.34

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<u>Section IV – Summary Report – Gaseous and Opacity Excess Emissions and CMS</u> Performance

A. Report Date and Submittal Reporting Period

Indicate the reporting period covered by this submittal and the date of this summary report. (63.10(e)(3)(vi))

Reporting Period begins	ing date Reporting Period ending	date Summary Report Date
July 1, 2009	December 31, 2009	January 31, 2010

B. Process Description and Monitoring Equipment Information

Complete the following process description and monitoring equipment information table for each affected source process unit:

Total operating time of affected source during the reporting period (days)

225,239 minutes of unit burning/ retaining hazardous waste; 3,369 minutes on virgin fuels.

Process unit name
Rotary Kiln Incineration System

Process unit description
Rotary kiln and ancillary equipment for combustion of hazardous wastes.

Emission and/or operating parameter limitations specified in the relevant standards
See Table 1 and 2 below.

TABLE 1 – APPLICABLE EMISSIONS STANDARDS

Emissions Parameter	Limit	Citation
Destruction and Removal Efficiency (DRE)	≥99.99%	40 CFR 63.1203(c)(1)
PCDDs/PCDFs	≤0.20 ng/dscm TEQ basis	40 CFR 63.1219(a)(1)(i)
HCI/Cl ₂	≤ 32 ppmv dry as HCl	40 CFR 63.1219(a)(6)
Mercury	≤130 µg/dscm	40 CFR 63.1219(a)(2)
Semi volatile Metals (SVM)	≤230 µg/dscm	40 CFR 63.1219(a)(3)
Low Volatile Metals (LVM)	< 92 μg/dscm	40 CFR 63.1219(a)(4)
Totals Hydrocarbons	≤ 10 ppmv	40 CFR 63.1219(a)(5)(ii)
Particulate Matter (PM)	≤0.013 gr/dscf or	40 CFR 63.1219(a)(7)
	34 mg/dscm	

TABLE 2 - OPERATING PARAMETERS

Process Parameter (Tag ID)	Units	Avg. Period	Basis	Limit 10/1/2008 DOC
Minimum Feed Lance Atomization Pressure ¹	Psig	Instant.	Mfg. Rec.	30
Maximum SCC Pressure (PT-4307 & PT-4308)	In. w.c.		ptember 4,2003 lett 5 concerning this re	
Maximum Temperature at ESP Inlet (TI-6002A/B)	°F	1-hr	CPT	428
Maximum Pumpable Waste Feed Rate (WQI-9000T)	Lb/hr	1-hr	CPT	27,988
Maximum Total Waste Feed Rate (WQI-9000F)	Lb/hr	1-hr	CPT	34,026
Minimum Kiln Temperature (TI-4300A/B)	°F	1-hr	СРТ	1,760
Minimum SCC Temperature (TI-4310A/B)	°F	1-hr	CPT	1,795
Maximum Process Gas Flow rate (FI-7510A/B)	Scfm	1-hr	CPT	67,581
Minimum Loc. 1 Carbon Feed Rate (WI-7003)	Lb/hr	1-hr	CPT	

¹ Each liquid lance has a pressure switch. When the pressure drops below 30 psig on any lance the feed from that lance will be automatically cutoff. Tag Ids: PSL-3113 (High BTU), PSL-3123 (Organic), PSL-3143 (Aqueous), PSL-3133 (Sludge), PSL-3153 (Slurry), and PSL-3100A/B (Sludge 2).

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Process Parameter (Tag ID)	Units	Avg. Period	Basis	Limit 10/1/2008 DOC
Minimum Loc. 2 Carbon Feed Rate (WI-7002)	Lb/hr	1-hr	CPT	
Minimum Loc. 1 Carbon Feed Pressure (PI-5732)	Psig	1-hr	СРТ	2.9
Minimum Loc. 2 Carbon Feed Pressure (PI-7132)	Psig	1-hr	СРТ	3.0
Maximum Ash Feed Rate (WQI-9000AH)	Lb/hr	12-hr	СРТ	8,440
Minimum Ring Jet Pressure Drop (DPI-7401)	in. w.c.	1-hr	CPT	27.0
Minimum Scrubber (1st and 2nd Packed Bed, combined) Liquid Flow Rate (FQI- 7201)	gpm	1-hr	CPT	1,309
Minimum Scrubber (Ring Jet) Liquid Flow Rate (FI-7404A/B)	gpm	1-hr	CPT	454
Minimum Scrubber (Ring Jet) Blowdown (FI-7403)	gpm	1-hr	CPT	27.0
Minimum Scrubber (Ring Jet) Tank Level (LIC-7401)	feet	1-lır	CPT	1.7
ESP Parameters	points of 4 and minim	5,000 volts and um current of 1	all fields available 90 sparks per minu 00 milliamps, each and Dec. 27, 2003	te, each field; field (see US
Minimum Scrubber (1st and 2nd Packed Bed, combined) Feed Pressure	in. w.c.	1-hr	Mfg. Rec.	Not Req'd.
Minimum Scrubber (1st and 2nd Packed Bed) Pressure Drop	in. w.c.	1-hr	Mfg. Rec.	1.3
Minimum Scrubber (3 rd Stage) Liquid pH (AI-7307A/B)	pH units	1-hr	Prior Testing	7.5
Maximum Total Chlorine Feed Rate (WQI-9000CL)	Lb/hr	12-hr	Prior Testing	2,828
Maximum Total Semi volatile Metals Feed Rate (WQI-9000SV)	Lb/hr	12-hr	Prior Testing	77.1
Maximum Total Low Volatile Metals Feed Rate (WQI-9000LV)	Lb/hr	12-hr	Prior Testing	400
Maximum Total Pumpable Low Volatile Metals Feed Rate (WQI-9000PLV)	Lb/hr	12-hr	Prior Testing	400
Maximum Total Mercury Feed Rate (WQI-9000M)	lb/hr	12-hr	Prior Testing	0.82
Stack THC (AI-7850)	ppmv	1-hr	Regulatory Requirement	<10

Monitoring Equipment Information

Monitored Parameter	Latest Certification or Audit Date	Instrument Description	Tag No. / Comments
ESP Inlet Temperature	11/18/09	Rosemount Transmitter / Thermocouple	Tag # TT-6002A/B (Redundant Instruments)
Kiln Inlet Shroud Pressure	11/5/09	Rosemount Pressure transducer	Tag # PT-4307
Kiln Outlet Shroud Pressure	12/5/09	Rosemount Pressure transducer	Tag # PT-4306
Kiln Temperature	(A) 8/21/09 (B) 3/11/09	Land CD1 / Laser Thermometer	Tag # TT-4300A/B (Redundant Instruments)
Secondary Combustion Chamber Temperature	(C) 8/21/09 (D) 11/23/09	Land CD1 / Laser Thermometer	Tag # TT-4310A/B Redundant Instruments
Flue Gas Flow Rate (Stack)	12/9/09	United Sciences Ultrasonic Gas Flow	Tag #FT-7805 Used in calculation of Process Flow
Flue Gas Flow Rate (Reheat)	12/9/09	United Sciences Ultrasonic Gas Flow	Tag #FT-7710 Used in calculation of Process Flow
Flue Gas Flow Rate (Scrubber Outlet)	12/9/09	United Sciences Ultrasonic Gas Flow	Tag # FT-7510B This is a redundant instrument for flue gas flow rate. (Redundant with Tag # FI-7510A)
Total Hydrocarbon Analyzer (Stack)	12/9/09	VIG Industries FID (Flame Ionization Detector)	Tag # AI-7850A/B (Redundant Instruments)
Scrubber Ring Jet Liquid Flow Rate	10/7/09	Rosemount Transmitter / Differential Pressure	Tag # FT-7404 A
Scrubber Ring Jet Liquid Flow Rate	10/7/09	Panametrics Ultrasonic Flow	Tag # FT-7404 B
Scrubber First Packed bed flow rate	10/7/09	PolySonics Doppler Flow	Tag # FT-7204 A
Scrubber First Packed bed flow rate	10/7/09	Panametrics Ultrasonic Flow	Tag # FT-7204 B

Monitored Parameter	Latest Certification or Audit Date	Instrument Description	Tag No. / Comments
Scrubber Second Packed bed flow rate	10/7/09	PolySonics Doppler Flow	Tag # FT-7304 A
Scrubber Second Packed bed flow rate	11/18/09	Panametrics Ultrasonic Flow	Tag # FT-7304 B
Scrubber Second Packed Bed Liquid PH	11/18/09	Electro-Chemical Devices	Tag # AT-7307A/B
Carbon Feed Rate Loc. 2	12/12/09	Generic Load Cell / Loss in Weight Feeder	Tag # WT-7002
Carbon Feed Rate Loc.	12/12/09	Generic Load Cell / Loss in Weight Feeder	Tag # WT-7003
Carbon Carrier Fluid Pressure Loc. 2	11/11/09	Rosemount Transmitter / Pressure	Tag # PT-7132
Carbon Carrier Fluid Pressure Loc. 1	11/11/09	Rosemount Transmitter / Pressure	Tag # PT-5732
High Btu Lance Atomizing Pressure	11/5/09	Generic pressure switch	Tag # PSL-3113
Organic Lance Atomizing Pressure	11/5/09	Generic pressure switch	Tag # PSL-3123
Aqueous Lance Atomizing Pressure	11/5/09	Generic pressure switch	Tag # PSL-3143
Sludge Lance Atomizing Pressure	11/5/09	Generic pressure switch	Tag # PSL-3133
Slurry Lance Atomizing Pressure	11/5/09	Generic pressure switch	Tag # PSL-3153
Sludge 2 Lance Atomizing Pressure	11/5/09	Generic pressure switch	Tag # PSL-3100A/B
Pumpable Hazardous Waste Feed Rate	10/14/09	Micromotion Mass Flow Meter	Tag # FT-3110 High BTU Lance
Pumpable Hazardous Waste Feed Rate	10/14/09	Micromotion Mass Flow Meter	Tag # FT-3120 Organic Lance
Pumpable Hazardous Waste Feed Rate	10/14/09	Micromotion Mass Flow Meter	Tag # FT-3140 Aqueous Lance
Pumpable Hazardous Waste Feed Rate	Not Applicable (calculation)	Positive displacement pump	Tag # FT-3150 Slurry Lance
Pumpable Hazardous Waste Feed Rate	Not Applicable (calculation)	Positive displacement pump	Tag # FT-3130 Sludge Lance
Pumpable Hazardous Waste Feed Rate	12/12/09	Generic Load Cell (Loss in weight calculation)	Tag # WT-3050 Drum Scale A Feeds Multiple Lances
Pumpable Hazardous Waste Feeds	12/12/09	Generic Load Cell (Loss in weight calculation)	Tag # WT-3055 Drum Scale B Feeds Multiple Lances

Monitored Parameter	Latest Certification or Audit Date	Instrument Description	Tag No. / Comments
Pumpable Hazardous Waste Feeds	12/12/09	Generic Load Cell. Loss in weight calculation	Tag # WT-3060 Tanker Scale A (South Bay) Feeds Multiple Lances
Pumpable Hazardous Waste Feeds	12/12/09	Generic Load Cell. Loss in weight calculation	Tag # WT-3065 Tanker Scale B (East Bay) Feeds Multiple Lances
Kiln Drum feed Weight Feeder	12/12/09	Generic Load Cell (Scale)	Tag # WT-3081 Front wall Drum Scale
Kiln Bulk Feed Crane	12/12/09	Generic Load Cell (Scale)	Tag # WT-3105 Front wall Crane Scale
Conveyor Scale Drum Processing	12/12/09	Generic Load Cell (Scale)	Tag # WT-3070 Feeds ARTS
Conveyor Scale Monorail Alter	12/12/09	Generic Load Cell (Scale)	Tag # WT-4050 Feeds ARTS
Floor Scale Drum Processing	12/12/09	Generic Load Cell (Scale)	Tag # WT-3075 Feeds ARTS
Floor Scale Drum Processing Lab Pack	12/12/09	Generic Load Cell (Scale)	Tag # WT-3080 Feeds ARTS
Splitting Scale Monorail	12/12/09	Generic Load Cell (Scale)	Tag # WT-3040 Feeds ARTS
Floor Scale Drum Processing - Portable	12/12/09	Generic Load Cell (Scale)	Tag # WT-3076 Feeds ARTS

Monitored Parameter	Latest Certification or Audit Date	Instrument Description	Tag No. / Comments
Ring Jet Blow Down	10/7/09	Panametrics Ultrasonic Flow	Tag # FT-7403.A/B
Ring Jet Vessel Level	(E) 11/7/09 (F) 11/7/09	Rosemount Transmitter/ Pressure	Tag # LT-7401A/B
Stack Oxygen Analyzers (wet and dry)	4/28/09	Ametek	Tag # AI-7860A/B (Redundant Instruments)
Ring Jet Differential Pressure	11/7/09	Rosemount Transmitter/ Pressure	Tag # DPT-7405A/B
Scrubber 1 st Packed Bed Differential Pressure	11/9/09	Rosemount Transmitter /Pressure transducer	Tag # DPI-7207
Scrubber 2nd Packed Bed Differential Pressure	11/9/09	Rosemount Transmitter /Pressure transducer	Tag # DPI-7307

C. Emission Data Summary

Complete the following emission data summary table for each affected source: (63.10(e)(3)(vi)(l))

Total duration of excess emission / parameter exceedances (minutes for opacity, hours for gases)

	Total	Total Operating time of affected source during the	% Of total source operating time during which excess emissions
Excess Emissions Maximum Ash Feed Rate (WQI- 9000AH)	Duration(min) 0	reporting period (min) 228,608	0.00%
Maximum Process Gas Flowrate (Fl- 7510A/B)	47.98	228,608	0.02%
Maximum Pumpable Waste Feed Rate (WQI-9000T)	0	228,608	0.00%
Maximum SCC Pressure (PI- 4300A/B)	22.9	228,608	0.01%
Maximum Temperature at ESP Inlet (TI-6002A/B)	0	228,608	0.00%
Maximum Total Chlorine Feed Rate (WQI-9000CL)	0	228,608	0.00%
Maximum Total Low Volatile Metals Feed Rate (WQI-9000LV)	0	228,608	0.00%
Maximum Total Mercury Feed Rate (WQI-9000M)	0	228,608	0.00%
Maximum Total Pumpable Low Volatile Metals Feed Rate (WQI- 9000PLV)	0	228,608	0.00%
Maximum Total Semi volatile Metals Feed Rate (WQI-9000SV)	0	228,608	0.00%
Maximum Total Waste Feed Rate (WQI-9000F)	0	228,608	0.00%
Minimum Feed Lance Atomization Pressure	0	228,608	0.00%
Minimum Kiln Temperature (TI-4300A/B)	259.03	228,608	0.11%
Minimum Loc. 1 Carbon Feed Pressure (PI-5732)	176.15	228,608	0.08%
Minimum Loc. 2 Carbon Feed Pressure (PI-7132)	82.1	228,608	0.04%
Minimum Loc. 1 Carbon Feed Rate (WI-7003)	168.13	228,608	0.07%
Minimum Loc. 2 Carbon Feed Rate (WI-7002)	5	228,608	0.00%
Minimum Ring Jet Pressure Drop (DPI-7401)	0	228,608	0.00%

Excess Emissions	Total Duration(min)	Total Operating time of affected source during the reporting period (min)	% Of total source operating time during which excess emissions occurred
Minimum SCC Temperature (TI- 4310A/B)	335.3	228,608	0.15%
Minimum Scrubber (1 st and 2 nd Packed Bed) Pressure Drop	0	228,608	0.00%
Minimum Scrubber (1 st and 2 nd Packed Bed, combined) Feed Pressure	0	228,608	0.00%
Minimum Scrubber (1 st and 2 nd Packed Bed, combined) Liquid Flow Rate (FQI-7201)	221.12	228,608	0.10%
Minimum Scrubber (3 rd Stage) Liquid pH (AI-7307A/B)	0	228,608	0.00%
Minimum Scrubber (Ring Jet) Blowdown (Fl-7403)	30	228,608	0.01%
Minimum Scrubber (Ring Jet) Liquid Flow Rate (FI-7404A/B)	0	228,608	0.00%
Minimum Scrubber (Ring Jet) Tank Level (LIC-7401)	0	228,608	0.00%
THC	1363.05	228,608	0.60%
ESP Controls	189.64	228,608	0.08%
Total Duration	2900,40	228,608	1.27%

Summary of causes of excess emissions / parameter exceedances (% of total duration by cause):

ТУРЕ	Sum Of Duration	% of Total Duration
Startup/shutdown	662.1	22.83%
Control Equipment Problems	741.8	25.58%
Process Problems	690.5	23.81%
Other unknown causes	485.50	16.74%
Other known causes	320.5	11.05%
	2900.40	100.00%

D. CMS Performance Summary

Complete the following CMS performance summary table for each affected source: (63.10(e)(3)(vi)(J))

Total duration o	f CMS downtime ¹
0 minutes	
Total operating time of affected	source during the reporting period
228,608 min	

Percent of total source operating time during which CMS were down	
0.00 %	_

¹Heritage-WTI, Inc. maintains redundant CMS equipment to prevent CMS downtime.

Summary of causes of CMS downtime (percent of downtime by cause)	
Monitoring equipment malfunctions	0
Non-monitoring equipment malfunctions	0
Quality assurance / quality control calibrations	0
Other known causes	0
Other unknown causes	0

E. CMS, Process, or Control Changes

- 1. Have you made any changes in CMS, processes, or controls since the last reporting period?

 ☐ Yes ☒No (if no, end of form) (63.10(2)(3)(vi)(K))
- 2. If you answered yes, please describe the changes below:

END OF REPORT